

In re:  
Ertan Erden  
Debtor

Case No. 20-12746-elf  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0313-2  
Date Rcvd: Jul 25, 2022

User: admin  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 4

The following symbols are used throughout this certificate:

| Symbol | Definition   |
|--------|--|
| +      | Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP. |

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 27, 2022:

| Recip ID | Recipient Name and Address                               |
|----------|--|
| db       | + Ertan Erden, 1 Larkspur Road, Levittown, PA 19056-2718 |

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

| Recip ID | Notice Type: Email Address                             | Date/Time            | Recipient Name and Address   |
|----------|--|----------------------|--|
| smg      | Email/Text: megan.harper@phila.gov                     | Jul 26 2022 00:11:00 | City of Philadelphia, City of Philadelphia Law Dept., Tax Unit/Bankruptcy Dept, 1515 Arch Street 15th Floor, Philadelphia, PA 19102-1595 |
| smg      | Email/Text: RVSVCBICNOTICE1@state.pa.us                | Jul 26 2022 00:11:00 | Pennsylvania Department of Revenue, Bankruptcy Division, P.O. Box 280946, Harrisburg, PA 17128-0946                                      |
| cr       | + Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com | Jul 26 2022 00:14:42 | PRA Receivables Management LLC, POB 41067, Norfolk, VA 23541-1067  |

TOTAL: 3

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 27, 2022

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 25, 2022 at the address(es) listed below:

| Name            | Email Address  |
|-----------------|--|
| ANDREW M. LUBIN | on behalf of Creditor PENNYMAC LOAN SERVICES LLC ecfmil@mwc-law.com, bkecf@milsteadlaw.com |

District/off: 0313-2

User: admin

Page 2 of 2

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BRAD J. SADEK

on behalf of Debtor Ertan Erden brad@sadeklaw.com  
bradsadek@gmail.com;sadek.bradj.r101013@notify.bestcase.com;documents@sadeklaw.com

JEROME B. BLANK

on behalf of Creditor PENNYMAC LOAN SERVICES LLC paeb@fedphe.com

KENNETH E. WEST

ecfemails@ph13trustee.com philaecf@gmail.com

MARISA MYERS COHEN

on behalf of Creditor PENNYMAC LOAN SERVICES LLC ecfmail@mwclaw.com, mcohen@mwclaw.com

MARISA MYERS COHEN

on behalf of Creditor PennyMac Loan Services LLC ecfmail@mwclaw.com, mcohen@mwclaw.com

REBECCA ANN SOLARZ

on behalf of Creditor American Heritage Credit Union bkgroup@kmlawgroup.com rsolarz@kmlawgroup.com

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 8

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|             |   |                        |
|-------------|---|------------------------|
| IN RE:      | : |                        |
| Ertan Erden | : | Chapter 13             |
|             | : | Case No.: 20-12746-ELF |
| Debtor(s)   | : |                        |

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Debtor, Ertan Erden, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on June 23, 2020.
2. The Chapter 13 Plan was confirmed on December 1, 2020.
3. On June 27, 2022, Creditor, American Heritage Credit Union, who services the debtor's vehicle loan, filed a Motion for Relief from the Automatic Stay.
4. American Heritage Credit Union agreed to a Stipulation of Settlement permitting the debtor to include post-petition arrears into a Modified Chapter 13 Plan. See Exhibit "A."
5. Debtor has paid \$34,051.67 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$1,475.00 per month for the remaining 36 months for a new base amount of \$81,151.67.
7. An Amended Schedule J was filed on July 20, 2022 to demonstrate the feasibility of the Modified Plan.

8. The debtor is aware they must remain current on all ongoing post-petition payments owed to American Heritage Credit Union in order to avoid any future modifications to the Automatic Stay.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Stipulation of Settlement of American Heritage Credit Union.

Dated: July 25, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor(s)  
Sadek & Cooper Law Offices  
1500 JFK Boulevard Suite #220  
Philadelphia, PA 19102  
215-545-0008  
brad@sadeklaw.com